

UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

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IN RE:	:	
Stacy McCauley-Cooney	:	Chapter 13
	:	
Debtors	:	Case No.: 18-13947MDC

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**MOTION TO APPROVE LOAN MODIFICATION WITH SETERUS**

NOW INTO COURT COMES, Stacy McCauley-Cooney, hereinafter referred to as “Debtor”, move this Honorable Court for an Order approving their loan modification with Seterus (“Mortgagee”), and avers the following:

1. On June 13<sup>th</sup>, 2018, Debtor filed a Voluntary Petition for relief under Chapter 13 of the Bankruptcy Code.
2. The Debtor, in an attempt to successfully reorganize and retain her family’s home, applied for a loan modification with his Mortgagee.
3. The Debtor completed her trial modification period payments.
4. Please find the loan modification attached and marked as “**Exhibit A.**”
5. Additionally, the Mortgagee has approved the Debtor for a permanent modification of her loan which makes her loan payment more affordable and will have a lower interest rate.
6. The Mortgagee requires an Order from this Honorable Court allowing the entry of said loan modification.

**WHEREFORE**, Debtor, in the above captioned Motion, prays that this Motion for Court approval of hier loan modification be granted.

Dated: March 7, 2019

/s/Brad J. Sadek, Esq

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